## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,	)
Plaintiff-Respondent,	)
v.	) 4:13CR00146-1 CDP
AHMAD BRITTON,	)
Defendant-Petitioner.	)

## MOTION FOR LEAVE TO FILE DOCUMENT IN EXCESS OF 15 PAGES

Comes now First Assistant Federal Public Defender Kevin C. Curran to request leave to file Defendant's Reply to the Government's Response to his Supplemental Motion for Compassionate Release in excess of the ordinary 15-page limit for pleading in Local Rule 4.01(D). He makes this request in order to properly set out the basis for defendant's request for "compassionate release" based on "extraordinary and compelling" circumstances under 18 U.S.C §3582(c)(1)(A)(i), as amended by the First Step Act of 2018, based on chronic comorbidities that put him at greatly elevated risk of more serious infection and death from the COVID-19 pandemic.

Respectfully submitted,

/s/ Kevin C. Curran KEVIN C. CURRAN, #29234MO First Assistant Federal Public Defender 1010 Market Street, Suite 200 St. Louis, Missouri 63101 Telephone: (314) 241-1255 Fax: (314) 421-3177

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ATTORNEY FOR DEFENDANT

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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2021, the foregoing was served by operation of the Court's electronic filing system upon the United States Attorney.

/s/ Kevin C. Curran Kevin C. Curran #29234MO First Assistant Federal Public Defender